

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BRANA GUTMAN, on behalf of herself
and all other similarly situated consumers

Plaintiff,

v.

UNITED RECOVERY SYSTEMS, L.P.,

Defendant.

No. 1:15-CV-02901

JOINT STATUS REPORT

Plaintiff, Brana Gutman, and Defendant, United Recovery Systems, LP (“URS,” and collectively with Plaintiff, the “Parties”) for their Joint Status Report state:

1. This Court has requested that the Parties file a joint status report on or before January 6, 2016.

2. As of January 6, 2016, the Parties have exchanged complete sets of written discovery and are conferring on the scheduling of all contemplated depositions.

3. It is not anticipated that any additional extensions of time will be necessary to complete discovery. If such an extension becomes needed, the Parties will promptly file a joint motion for an extension or stipulate privately to said extension.

4. The Parties continue to engage in settlement negotiations, which they believe will be fruitful without intervention or assistance of the Court.

5. If the Parties are unable to resolve the matter, URS intends to request a premotion conference on a motion for summary judgment on or before this Court’s deadline of January 28, 2016.

6. If the Parties believe that the assistance of the Court will materially aid settlement negotiations, they shall promptly request a settlement conference with the Court.

Dated: Brooklyn, New York
January 6, 2016

Dated: West Caldwell, New Jersey
January 6, 2016

/s/ Maxim Maximov
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